

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC, PATENT LITIGATION	§ Case No. 2:22-MD-03042-JRG § <u>JURY TRIAL DEMANDED</u> § §
THIS DOCUMENT RELATES TO ALL ACTIONS	

**JOINT MOTION FOR ENTRY OF
THIRD AMENDED DOCKET CONTROL ORDER**

Pursuant to the Court’s First Amended Docket Control Order dated October 24, 2022 (Dkt. 15), the Parties comprising Taasera Licensing LLC (“Taasera”), Quest Patent Research Corporation (“Quest”), Palo Alto Networks Inc. (“Palo Alto”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), and Trend Micro, Inc. (“Trend Micro US”) have met and conferred and hereby file this Joint Motion for Entry of Agreed Third Amended Docket Control Order, attached hereto as Exhibit A. The new deadlines proposed by the Parties are summarized in the below chart.

Current Deadline	New Deadline	Description
September 18, 2023	September 11, 2023	Deadline to Complete Fact Discovery
December 2, 2022	February 28, 2023	Comply with Standing Order Regarding Subject-Matter Eligibility Contentions ¹
December 2, 2022	February 28, 2023	Comply with P.R. 3-3 & 3-4 (Invalidity Contentions)
November 14, 2022	February 7, 2023	*File Proposed Protective Order and Comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures)

¹ <http://www.txed.uscourts.gov/sites/default/files/judgeFiles/EDTX%20Standing%20Order%20Re%20Subject%20Matter%20Eligibility%20Contentions%20.pdf> [https://perma.cc/RQN2-YU5P]

		The Proposed Protective Order shall be filed as a separate motion with the caption indicating whether or not the proposed order is opposed in any part.
November 11, 2022	January 31, 2023	*File Proposed Discovery Order The Proposed Discovery Order shall be filed as separate motions with the caption indicating whether or not the proposed order is opposed in any part.
November 4, 2022	January 24, 2023	Join Additional Parties
October 28, 2022	January 3, 2023	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)

Good cause exists for amending the deadlines to File Proposed Discovery Order and to File Proposed Protective Order and Comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures). There are three additional tag-along actions that were recently filed in this District and in the Western District of Texas:

- *Taasera Licensing LLC v. Fortinet Inc.*, C.A. No. 2:22-cv-00415 (E.D. Tex. Oct. 21, 2022)
- *Taasera Licensing LLC v. Musarubra US LLC, D/B/A Trellix*, C.A. No. 2:22-cv-00427-JRG (E.D. Tex. Oct. 31, 2022)
- *Taasera Licensing LLC v. CrowdStrike, Inc. and CrowdStrike Holdings, Inc.*, C.A. No. 6:22-cv-01094 (W.D. Tex. Oct. 21, 2022)

The additional time for these deadlines will facilitate negotiations on the Proposed Discovery Order and the Proposed Protective Order between all parties to this multidistrict litigation (“MDL”) inclusive of the tag-along cases, and allow sufficient time for all Parties to submit Initial and Additional Disclosures. The listing of cases in the “Filings in the Master

Docket by the Court" section of the Docket Control Order has also been modified to include the two new cases in this District that were consolidated into the MDL by the Court.

Dated: November 10, 2022

Respectfully submitted,

/s/ Alfred R. Fabricant

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 10, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant